

DAYLE ELIESON
Acting United States Attorney
District of Nevada

SHEA LITA BOND, SBN D.C. 469103
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, CA 94105
Tel: (415) 977-8934
Fax: (415) 744-0134
Email: Shea.Bond@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TANYA L. ISAHAROV,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:17-cv-01958-APG-GWF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(SECOND REQUEST)**

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm in response to Plaintiff's Motion for Remand (Dkt. No. 15), currently due on January 22, 2018, by 30 days, through and including Wednesday, February 21, 2018. Defendant further requests that all subsequent deadlines set forth in the Court's Order Concerning Review of Social Security Cases (Dkt. No. 13) be extended accordingly.

This is Defendant's second request for an extension of time to respond to Plaintiff's Motion for Remand. Defendant requests this extension because of the workload of Defendant's attorney assigned to this case and to allow sufficient time to adequately research and prepare the issues presented by

1 Plaintiff in her motion. This request is made in good faith and with no intention to unduly delay the
2 proceedings.

3 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
4 motion, on January 16, 2018.

5 It is therefore respectfully requested that Defendant be granted an extension of time to respond
6 to Plaintiff's Motion for Remand, through and including February 21, 2018.

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8 Dated: January 17, 2018

Respectfully submitted,

9 DAYLE ELIESON
10 Acting United States Attorney

11 /s/ Shea Lita Bond
12 SHEA LITA BOND
Special Assistant United States Attorney

13 OF COUNSEL:

14 ALLISON J. CHEUNG
15 Assistant Regional Counsel, Region IX
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17 IT IS SO ORDERED:

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19 UNITED STATES MAGISTRATE JUDGE

20 DATED: 01/18/2018
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